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December 2, 2020

**Via ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Velez*, 19-cr-862 (VEC) (Hector Bonaparte)

Dear Judge Caproni:

We write in connection with our reply to the government's opposition to Mr. Bonaparte's request for bail. We respectfully request that the Court permit us to redact the substantive portions of Exhibits A and B, as well as portions of sentences describing those exhibits in the reply. These redactions would be made to preserve Mr. Bonaparte's privacy in light of the personal medical information they contain. Consistent with your Honor's Individual Practices in Criminal Cases, counsel will email Chambers a copy of the proposed redactions identified by highlighting.

The government consents to the redaction of these documents.

Respectfully submitted,

By: /s/ Steven M. Witzel  
Steven M. Witzel  
Jennifer L. Colyer  
Anne S. Aufhauser

Cc: Assistant United States Attorney Adam S. Hobson, via ECF  
Assistant United States Attorney Elinor L. Tarlow, via ECF

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Due to the sensitive medical information in Mr. Bonaparte's reply in support of his bail application, the motion to seal as proposed is GRANTED.

The Clerk of Court is respectfully directed to close the open motion at docket entry 281.

SO ORDERED.



Date: December 3, 2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE